



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NEW YORK, 10007

February 26, 2021

Colleen S. Liddell
Ford Motor Company
290 Town Center Drive, Suite 800
Dearborn, MI 48126

Re: December 2020 Operable Unit Two Remedial Action Work Plan
Ringwood Mines/Landfill Site, Ringwood, New Jersey

Dear Ms. Liddell:

The U.S. Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) have completed review of the December 2020 Operable Unit Two Remedial Action Work Plan (RAWP) for the Ringwood Mines/Landfill Site. EPA's and NJDEP's comments have been attached to this letter. In addition, RAWP comments received from EPA's Technical Assistance Services for Communities contractor, the Ringwood Environmental Commission and a Borough of Ringwood resident have been attached for your consideration.

In accordance with the August 2020 Consent Decree, Civil Action No. 2:19-cv-12157, the attached comments should be addressed in a revised RAWP, to be submitted to EPA and NJDEP within twenty-one (21) days of the date of this letter.

If you have any questions concerning this matter, please call.

Sincerely yours,

Joseph A. Gowers, Project Manager
New Jersey Remediation Branch

Attachments

cc: C. Coslett, de maximis
D. Zaliwski, NJDEP
L. Dodge, Excel
S. Heck, Borough of Ringwood

USEPA AND NJDEP COMMENTS ON THE DECEMBER 2020
OPERABLE UNIT TWO REMEDIAL ACTION WORK PLAN FOR THE
RINGWOOD MINES/LANDFILL SUPERFUND SITE

General Comments:

- 1.- The OU2 Remedial Action Work Plan includes specific construction details for the Borough of Ringwood Recycling Center, in addition to the OU2 remedy selected in the June 2014 Record of Decision and April 2015 Explanation of Significant Differences. Therefore, EPA's ultimate approval of the Remedial Action Work Plan should not be construed as approval of the construction details of the Recycling Center, which is being addressed under the regulatory authority of the State of New Jersey.
- 2.- References to NJDEP Case Manager Ken Petrone should be replaced with Dylan Zaliwski throughout the Remedial Action Work Plan and appendices.
- 3.- Figures currently incorporated into the Remedial Action Work Plan include an organization chart, submittal registry, and project schedule. This document does not include the referenced site location figure (Figure 1), or additional figures that define the areas of excavation, capping, etc. The Agencies request that the Remedial Action Work Plan be revised to include figures depicting the areas of proposed excavation (one with depths and one with analytical data), locations of necessary staging and decontamination areas, and the design drawings referenced in Sections 6.2 (Site Preparation), 7.4 (Soil Excavation), and 7.5 (Site Grading and Capping).
- 4.- The word "remediation" has been misspelled on several of the Figures included in the appendices to the Remedial Action Work Plan. This error should be corrected in the revised document.
- 5.- Monthly updates for the project are planned while remediation activities occur. It is mentioned in the Remedial Action Work Plan that these reports will be sent to EPA. Copies of these monthly reports should also be provided to the NJDEP.
- 6.- The Peters Mine Pit contains an angled monitoring well, SC-1. The remediation plans do not clearly identify if this well will be impacted by the excavation activities. Though well abandonment is mentioned within the appendices, it is not clear if this applies to SC-1. The NJDEP requests clarification on the potential impacts to SC-1 and other wells during the implementation of this remedial action.
- 7.- The NJDEP issued a Permit By Rule (PBR) for the de-watering and discharge of water associated with the remediation of the Peters Mine Pit. Prior to issuance of the PBR, there were discussions about discharging the water into a "to-be-constructed" stormwater detention basin that is to be constructed south of the Peters Mine Pit (PMP) footprint. There is no discussion of this option in the Remedial Action Work Plan, and the construction schedule shows the stormwater basin (item #49) (from September 2, 2021 to September 9, 2021) being installed several months after dewatering (item #40) is to begin (from June 3, 2021 to October 10, 2021).

NJDEP requests clarification as to whether the basin will be constructed before de-watering begins so that it could be used to store and infiltrate water from the PMP remediation.

8.- The NJDEP notes the plans to utilize an extended detention basin. In the PBR for the stormwater, it is noted that the basin is to be constructed southeast of the PMP area. However, the specific location of the basin is not defined in the document. The Department requests that the planned location of the basin be noted in the Remedial Action Work Plan.

9.- The Agencies note that fencing should be installed around the detention basin to be constructed in the PMP Area, given its proximity to residences.

10.- The completion of a Remedial Action Report should be discussed in the Remedial Action Work Plan.

Specific Comments:

1.- Table of Contents – The approved Soil Erosion and Sediment Control Plan should be included as an appendix.

2.- Acronyms/Abbreviations – The acronym AC for Area of Concern should be added to this table.

3.- Page 1-1, Section 1.0, First Paragraph – The last sentence in this paragraph should be revised to reference the April 15, 2015 ESD.

4.- Page 1-1, Section 1.0, Second Paragraph – The first sentence in this paragraph should clarify that the remedial design is for OU2 of the Site.

5.- Page 1-1, Section 1.0, Fourth Paragraph – The date of the approved OU2 Final Remedial Design Report is October 2017. This paragraph should be revised accordingly.

6.- Page 1-1, Section 1.0, Fourth Paragraph – This paragraph should be revised to reference the August 5, 2020 entry date of the judicial Consent Decree rather than the signed date.

7.- Page 1-4, Last Bullet - This bullet should be revised to reference the August 5, 2020 entry date of the judicial Consent Decree rather than the signed date.

8.- Page 2.1, Section 2.0, Table 2-1 – This table should be revised to discuss the organization of the entire Remedial Action Work Plan, including the text sections.

9.- Page 3-2, Section 3.2.2, Second Paragraph – The signature date of the referenced ESD should be revised to April 15, 2015.

10.- Page 3-2, Section 3.2.2, Third Paragraph, Second Bullet – This bullet should be revised to read “Placement and compaction of fill...”

11.- Page 6-1, Staging Areas - Figures should be provided in the Figures section of the Remedial Action Work Plan for the staging areas which show details including limits of gravel, trailer locations, stockpile locations and decon pad locations.

12.- Page 6-3, Section 6.2.2, Third Paragraph - The design drawing sheet with the temporary basin details should be referenced in this paragraph.

13.- Page 6-5, Section 6.2.5 (Existing Recycling Center Removal), Second Paragraph - The Remedial Action Work Plan does not include a plan for the restoration of the former recycling center area. As described in the OU2 Record of Decision, this area is planned as greenspace. NJDEP requests that a more detailed explanation of the restoration activities for the former recycling plant area be provided.

14.- Page 7-5 – RECON notes on this page that, “Samples will be collected from the temporary stockpiles and sent to a New Jersey-certified laboratory for testing of ignitability, corrosivity, reactivity, and TCLP Metals under chain of custody and with rapid analytical turnaround time, typically 24-36 hours.” Given that the TCLP test itself takes a minimum of 18 hours, a more reasonable timeframe would be to expect results in 3 to 4 working days.

15.- Page 7-7, Fifth Bullet – This bullet indicates that, “Monitoring wells currently exist downgradient of the PMP fill excavation area that are available for groundwater quality monitoring during construction, if needed (see further discussion below)”. Where can the further discussion be found?

16.- Page 8-1, Section 8.0 – This section should be revised to explain how the interim groundwater and surface water monitoring required as a component of the selected OU2 remedy will be addressed.

17.- Page 9-1, Section 9.1, NJDEP Bullet – This bullet should be revised to identify Dylan Zaliwski as the NJDEP Project Manager.

18.- Page 9-2, Section 9.2, Third Bullet – Please revise to read, “...that were submitted...”.

19.- Page 12-1 – The Remedial Action Work Plan should indicate whether the areas under the temporary stockpiles will be sampled once the stockpile has been removed.

20.- Page 12-1, Section 12 (Final Site Restoration and Demobilization Activities), Second Paragraph - Street cleaning is described as a post-remediation activity. There is no mention of periodic street cleaning as active remediation is occurring. Considering that activities included limited excavations and use of temporary access road, dust and particulates will accumulate during active remediation. The NJDEP requests that periodic street cleaning occur during remediation with the already suggested post-remediation cleaning.

21.- Figure 4-1 – The NJDEP Project Manager box should be revised to identify Dylan Zaliwski as the NJDEP Project Manager.

Appendix B – Health and Safety Plan

22.- COVID-19 Action Plan, Safety Meeting & Daily Sign In/Sign Out Sheet - . Please note that with regards to COVID19 temperature screening information, EPA does not record the individual's names and associated temperature because it can be interpreted as private medical information.

Appendix D – Community Air Monitoring Plan

23.- Table of Contents, Section 2.2 – The “Error! Bookmark not defined.” Message should be corrected.

24.- Page 10, Section 6.2.1 (Location of Monitoring Stations), Fourth Paragraph - The NJDEP notes that the plan directs the use of three (3) air monitoring stations at each area of concern (AOC), when active remediation is occurring. This includes two (2) downwind stations and one (1) upwind station. The AOCs slated for active remediation are either adjacent parcels to, or within 500 feet, of occupied residences. Considering the close proximity, the perimeters of the site that are adjacent or closest to the residences should be continuously monitored. Furthermore, the NJDEP requests that this plan be amended to include an additional air monitoring station that is positioned between the active AOC and adjacent residences.

25.- Page 13, Section 6.2.4.2 (Volatiles), Fourth Bullet – The NJDEP notes alarm and exceedance conditions for the air monitoring system. Dust and particulates will be suppressed by spraying water. However, the specific suppression tools for vapors are not clearly defined in this section. This section of the plan should be revised to clarify the vapor suppression protocol.

Appendix E – Quality Assurance Project Plan

26.- Worksheets 1 & 2 – These worksheets should be signed by the lead organization representatives.

27.- Worksheet #12 – For the Measurement Performance Criteria designated as “Standard Laboratory Statistical Limits,” these limits should be stated in Worksheet #28.

28.- Worksheet #12 - Please explain the reasons for not providing Field Blanks or Field Duplicates.

29.- Worksheet #17 – This worksheet should explain how a characteristic sample will be collected if drums or paint waste are discovered during excavation. Furthermore, the process for determining if Groundwater quality will be impacted should be described in this worksheet.

30.- Worksheet #19 & 30 – The accreditation expiration date for the analytical laboratory should be provided in these worksheets. Clarification should also be provided as to whether the Data Package Turnaround time includes time for data validation.

- 31.- Worksheet #20 – The decision to not collect field QC samples should be explained in this worksheet.
- 32.- Worksheet #28 – Information regarding field QC samples should be included in this worksheet. Furthermore, the “Project-Specific MPC” should be restated from Worksheet #12.
- 33.- Worksheet #28 – This worksheet should be revised to include more specific corrective actions than “Determine problem, recalibrate.”
- 34.- Worksheet #37 – This worksheet should describe how “...large positive or negative bias...” will be determined.
- 35.- Figure 2 - The area that will be excavated and the staging areas should be displayed on this map.

Appendix H – Transportation & Disposal Plan

- 36.- Page 3, Section 4.1 – This plan should identify what procedures are to be implemented to ensure that the 15 mph speed limit is adhered to. During past remedial efforts at the Site, construction contractor vehicles were periodically used to escort trucks to ensure compliance with the specified speed limit.
- 37.- Page 7, Section 7, Table 1 – EPA Region 2 has been informed that Heritage Thermal Services, Heritage Environmental Services, Heritage Landfill and Chemical Waste Management Facility are currently acceptable to receive waste regulated by the CERCLA Off-Site Rule. EPA Region 2 will conduct another compliance check within 60 days.
- 38.- Page 7, Section 7, Table 1 – The correct address for Heritage Thermal Services appears to be 1250 Saint George Street.



Technical Assistance Services for Communities

Ringwood Mines/Landfill Superfund Site Fact Sheet – February 2021

Summary of Ringwood Mines/Landfill Superfund Site Operable Unit (OU) 2 Remedial Action Work Plan

This fact sheet covers the Ringwood Mines/Landfill Superfund Site OU2 Remedial Action Work Plan (RAWP), submitted to EPA in December 2020, available online at:

<https://semspub.epa.gov/src/document/02/620277>. Remedial Construction Services (RECON) prepared the RAWP for Ford Motor Company. The work plan describes OU2 remedial activities. The OU includes the Cannon Mine Pit (CMP) Area, the Peters Mine Pit (PMP) Area, and the O'Connor Disposal Area (OCDA).

Remedial activities will take place beginning in spring 2021, after EPA's approval of the RAWP. The project schedule lists completion by February 2022. The project order is the CMP Area, the PMP Area, and the OCDA. The RAWP includes the construction of the Recycling Center at the OCDA.

The 500-acre Ringwood Mines/Landfill site is in a historic iron mining district in the Borough of Ringwood in Passaic County, New Jersey. Magnetite mines operated on site as early as the 1700s. In the late 1960s and early 1970s, Ford Motor Company disposed of paint sludge and other wastes on site. To manage the cleanup, EPA divided the site into OUs. OU1 was originally the entire site. Later, EPA established OU2 and OU3. Figure 1 shows the land areas of concern in OU2. OU3 is sitewide groundwater and the St. George Pit Area. In September 2020, EPA selected the OU3 remedy.



TASC Remedial Action Work Plan Presentation

**Thursday, February 25, 2021
6:00 p.m. to 8:00 p.m.**

Please join us for a virtual online presentation of TASC's review of the RAWP.



Join by smartphone or tablet:

Go to

<https://skeno.zoom.us/j/94173853265?pwd=aVJNVTFFWlJVM0lzL1pObS81ekRqdz09>.

It may prompt you to download the Zoom Cloud Meetings app.



Join using a web browser on a computer:

1. Go to join.zoom.us.
2. Enter the Meeting ID: 941 7385 3265.
3. At the bottom of the window, click on "Join from Your Browser."
4. Enter your name.
5. Enter the Passcode: 242050.
6. Click "Join Audio by Computer."

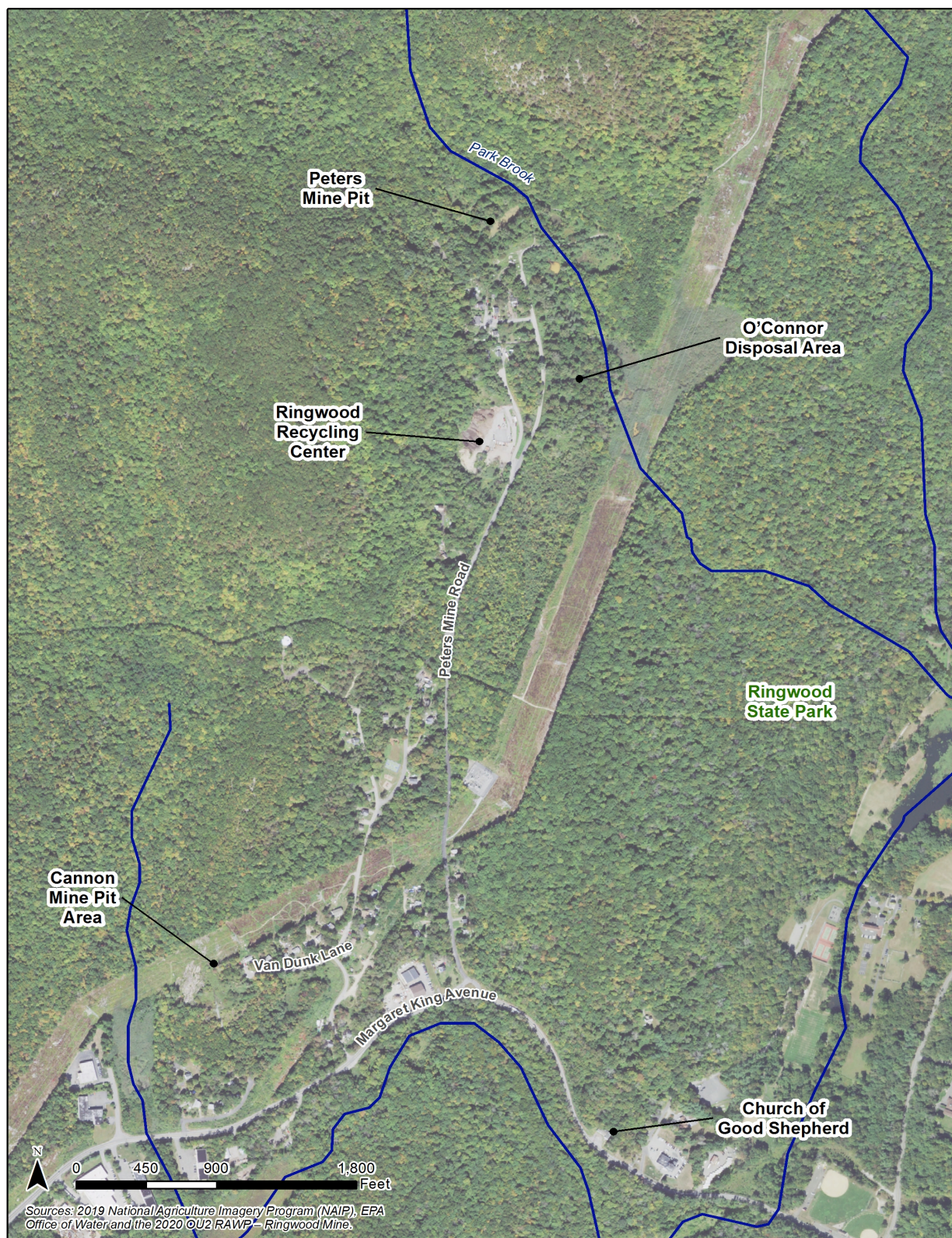


Join by phone:

1. Call 1-833-548-0282 (US Toll-free).
2. Enter the Meeting ID (941 7385 3265) and press # when prompted.
3. Press # to continue (no Participant ID).
4. Enter the Passcode (242050) and press # when prompted.

The U.S. Environmental Protection Agency's (EPA's) Technical Assistance Services for Communities (TASC) program funded this fact sheet. Its contents do not necessarily reflect the policies, actions or positions of EPA. TASC technical comments are provided in the last section.

Figure 1: Location of OU2 RAWP Activities



The OU2 RAWP has 14 sections, four figures and nine appendices:

1. Introduction
2. RAWP Document Organization
3. Existing Site Conditions
4. Remedial Action Field Team
5. Remedial Action Pre-Mobilization Tasks
6. Mobilization and Site Preparation
7. Field Tasks
8. Monitoring Activities
9. Site Management
10. Quality Assurance and Quality Control Program
11. Remedial Action Health and Safety Program
12. Final Site Restoration and Demobilization Activities
13. Remedial Action Project Schedule
14. References

Figure 1-1 – Site Location Map

Figure 4-1 – Remedial Field Activities Team Organization

Figure 5-1 – Submittal Register

Figure 13-1 – Project Schedule

Appendix A – Construction Quality Assurance/Quality Control Plan (CQA/QCP)

Appendix B – Site-Specific Health and Safety Plan (HASP)

Appendix C – Vibration Monitoring Plan

Appendix D – Community Air Monitoring Plan

Appendix E – Quality Assurance Project Plan (QAPP)

Appendix F – Field Sampling Plan

Appendix G – Paint Waste, Drum, and Drum Carcass Excavation and Removal Plan

Appendix H – Transportation & Disposal Plan

Appendix I – Technical Specifications

1. Introduction

The introduction provides the purpose of the document, prior documents that provided the basis for it and overall performance standards. It also summarizes relevant project documents.

In 2015, EPA finalized the OU2 remedy. Primary components of the remedy include:

- Appropriate management of fill, waste and soil, including reuse on site or proper disposal off site.
- Use of engineered caps.
- Use of institutional and engineering controls:
 - Security fencing and signs.
 - The CMP Area and PMP Area will have boulders to discourage cap access by all-terrain recreation vehicles.
 - Institutional controls will be a New Jersey Department of Environmental Protection (NJDEP) deed notice.

2. RAWP Document Organization

The table in this section summarizes the RAWP's appendices. It also lists the attachments in the appendices.

3. Existing Site Conditions

This section provides a general description of the site and its location, including current site uses. It provides background information on the PMP Area, the OCDA and the CMP Area. For example, it covers the remedies and prior investigations for each area.

It also summarizes site geology and groundwater. Site-related groundwater is being addressed separately under OU3. It also provides a conceptual site model for each area.

Conceptual Site Model (CSM)

A CSM represents the physical, chemical and biological processes (either written or illustrated) that control movement of contamination. It also represents how people could be exposed to site-related contaminants.

CMP Area

Located in the southwest part of the site. Covers about 2 acres. Next to the Van Dunk Lane cul-de-sac.

OCDA

Located in the north-central part of the site, just south of the PMP Area. Covers about 12 acres. Next to and extends along Peters Mine Road. Slopes to the east toward Park Brook.

PMP Area

Located in the north-central part of the site. Covers about 3 acres. Most of the area is in Ringwood State Park. The remaining area is on Borough of Ringwood property. A half-acre pond is in the PMP Area.

4. Remedial Action Field Team

This section summarizes the primary firms involved in the OU2 activities. Figure 4-1 also covers this information. Section 9.1 provides detail on lines of communication and reporting for all parties. The de maximis project coordinator will coordinate communication among Ford Motor Company, EPA and NJDEP. The major firms involved in the project include de maximis, Tetra Tech and RECON. Subcontractors include E2 Project Management (wildlife herpetologist), Vibratex (vibration monitoring/technical assistance), Emilcott Technologies (community air monitoring plan implementation/technical assistance) and Pennoni (site surveyor).

5. Remedial Action Pre-Mobilization Tasks

This section summarizes activities that will happen before work (mobilization) begins at the Site. They include remedial action contractor submittals, permits, construction layout inspections and surveys, and utility locations.

6. Mobilization and Site Preparation

This section includes information about site mobilization and site preparation, including site security and access, staging areas, sediment barriers, and decontamination. Mobilization to the site will occur in spring 2021 after EPA approval of the RAWP.

6.2 Site Preparation

Site security will consist of fencing during construction. It will be a combination of new and existing fencing. Portable fencing will be used where necessary. Any required permanent fencing will be put in place at the end of the work.

Workers can access each of the areas from a public roadway. However, in each case, cleanup work will require some improvements.

This section has a subsection for the CMP Area, the OCDA and the PMP Area as well as new recycling center construction and current recycling center removal (6.2.1, 6.2.2, 6.2.3, 6.2.4 and 6.2.5). The subsections describe where work will occur and specifics about work in each area. Figure 3, at the end of this fact sheet, shows site layout plans for each area.

7. Field Tasks

This section covers details on the main field activities for the remedial action. The topics include removal of surficial debris and vegetation, electrical utility power drops to the site, preparation of equipment staging and site support facility locations, soil excavation, site grading and capping, and materials management.

Initial tasks will include vegetation removal, recycling of metal and tires, and removal of surficial debris.

Off-Site Disposal

Table 1 in Appendix H lists the proposed facilities Ford Motor Company will choose from for disposal of waste materials, subject to EPA final approval.

The list includes facilities in Ohio, Indiana, Pennsylvania, Alabama and New Jersey.

Power drops from overhead lines next to the site will provide electrical power. The drops' locations will maximize coverage of the site to limit the

length of electrical cable from the source to the equipment.

Digging up material from the PMP Area will require the construction of about 11 stockpile areas for the temporary storage of material. Each stockpile will be lined with plastic and a 1-foot layer of one-inch diameter stone. The stockpiles will be surrounded with haybales to prevent stormwater runoff. Similar temporary stockpiles of solid waste and paint waste will be constructed for the other areas, as needed.

8. Monitoring Activities

The RAWP's appendices cover monitoring requirements, as outlined in the Vibration Monitoring Plan (VMP) and Community Air Monitoring Program (CAMP).

9. Site Management

This section describes site management. Intrusive activities will take place five days a week, from Monday to Friday. The workday will start no earlier than 7:00 a.m. and run no later than 5:30 p.m. This section includes subsections on project coordination and communication, remedial action project documentation, coordination of permit and permit equivalency requirements, project meetings, and site security.

Regular union holidays will be non-working days. They include Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving, Christmas Day and New Year's Day.

Site security will include perimeter fencing and gates, site sign-in, lighting and motion sensitive cameras. Perimeter fencing will be inspected and maintained throughout the project. Lights may be motion activated or dusk to dawn. Cameras will be inspected daily.

The report indicates there will be daily safety briefings for on-site workers and weekly progress meetings, as well as meetings prior to major construction activities. Advance approval will be required for a site visitor to enter any of the work areas.

Vibration Monitoring Plan (VMP)

Appendix C is the VMP. Heavy equipment used to complete remedial activities may produce vibrations. Vibrations could affect areas near the construction, including adjacent structures. The plan describes the activities and responsibilities to address potential impacts to the area in the immediate vicinity of the construction activities, including adjacent structures.

Community Air Monitoring Programs (CAMP)

Appendix D is the CAMP. It was prepared to monitor air quality for the protection of on-site personnel and nearby community members. Sampling will monitor dust, particulates and total volatile organic compounds (TVOCs) in real time in the immediate work zone and along the perimeter of the work areas.

Water misting will keep the ground surface and excavated materials moist. It will be the primary dust and particulate suppression method.

10. Quality Assurance and Quality Control Program

This section describes the Construction Quality Plan and the Analytical Quality Plan. They are included in Appendix A and Appendix E, respectively.

11. Remedial Action Health and Safety Program

Appendix B is the site's Health and Safety Plan (HASP). It identifies anticipated hazards and prescribes control measures for use during the OU2 cleanup. This section includes subsections on setup of site work zones, decontamination procedures, and final equipment decontamination.

The purpose of the HASP is to provide health and safety guidelines for RECON employees,

subcontractors and visitors during OU2 construction activities.

12. Final Site Restoration and Demobilization Activities

This section covers the activities that will follow OU2 remedial activities. They include the restoration and repaving of the driveway and cul-de-sac in the CMP Area. Section 6.2.1 of the RAWP also describes these activities.

13. Remedial Action Project Schedule

This section describes the schedule for major parts of OU2 remedial activities. During the activities, the schedule will be updated every two weeks.

It includes:

- Beginning work: October 2, 2020.
- Completing CMP Area cleanup: April 30, 2021.
- Completing PMP Area cleanup: November 19, 2021.
- Completing OCDA Area cleanup: October 26, 2021.
- Completing new Recycling Center: February 8, 2022.
- Decommissioning existing recycling center and completing all other activities: January 19, 2022.

14. References

This section summarizes the document references.

Technical Comments

TASC technical advisors have reviewed the RAWP with respect to potential community concerns and questions. TASC also reached out to interested community members and stakeholders to solicit feedback on current community questions and concerns. This section summarizes concerns described by community members and concerns identified by TASC technical advisors. Comments mostly fall into two categories – public communication and safety during remedial actions.

TASC does not submit comments to EPA directly. Community members, groups or stakeholders may choose to submit any or all of the following comments to EPA.

Technical Comment #1: Section 1 says that “following the issuance of the final construction documents for the Recycling Center, all applicable changes to the RAWP and appendices will be amended to reflect the RAC [Remedial Action Contractor] construction of the facility.” *Community members may want to ask EPA if there are any significant changes to the RAWP anticipated at this time and how EPA will keep the public informed of RAWP changes.*

Technical Comment #2: Section 4 describes the remedial action field team. *Community members may want to ask EPA about a designated community liaison or a site communication plan to keep community members up to date on site activities and answer their questions. Community members may want to recommend using already formed groups such as the Ringwood Environmental Commission or the Community Advisory Group as communication conduits to give and receive feedback about site-related communications. Community members may also have suggestions on forms of communication that they would prefer such as news outlets, publications, site tours, website updates, special meetings, fact sheet distribution or door knockers. Community members may want to ask for a hotline number for reporting immediate concerns to EPA during cleanup.*

Technical Comment #3: Section 6 describes site security including fencing. *Community members with knowledge of the site and current site uses may want to provide feedback to EPA about current fencing concerns (a community member commented to TASC that current fencing is entirely missing in some areas and access gates are open) and suggestions for community friendly signage. If fencing and signage is not adequate, community members may want to suggest evaluation of additional site security monitoring measures.*

Technical Comment #4: Section 6 provides information on site mobilization and preparation. It includes subsections 6.2.1, 6.2.2, 6.2.3, 6.2.4 and 6.2.5. Each subsection addresses a specific area: the CMP Area, the OCDA and the PMP Area as well as new recycling center construction and current recycling center removal. *These sections may be of particular interest to the community. Community members may want to provide feedback on these sections to EPA.*

6.2.1 CMP Area

- Part of the work will take place in the Van Dunk Lane cul-de-sac. The driveway for the property owner to the north will be temporarily relocated (shown on Design Drawing CMP-2). Restoration of the resident's property driveway will follow, after completion of construction (Design Drawing CMP-3). *This resident may want to share any access-related concerns to their home during these activities with EPA.*

6.2.2. OCDA

- The extended detention basin is sized using a 25-year storm scenario. *Community members may want to ask how this determination was made and whether a 100-year storm scenario could be applied.*

6.2.4 Recycling Center Construction

- The RAWP says that Drawing 7 includes lighting for the new recycling center. This drawing is not included in the RAWP. *Community members may want to ask to see Drawing 7 and provide EPA with any lighting requests – needing more light for security, for example, or less light for nearby residents or users.*

Technical Comment #5: Section 7 includes information about the restoration of the PMP Area with indigenous vegetation consistent with the fact that it is on state parklands. Restoration will create a more diverse ecological community structure, including deep and shallow emergent plant communities that will provide habitat for vernal pool-dependent species. *If community members are interested in these plantings, they may want to share their opinions with EPA or request progress updates during this part of site work.*

Technical Comment #6: Section 7 says that digging up material from the PMP Area will require construction of several stockpile areas for the temporary storage of material. Stockpile storage areas will be limited to a volume of 500 cubic yards. An average hot tub holds 0.94 cubic yards, so this is equivalent to 550 average hot tubs. About 11 stockpiles will be established. Stockpiles will generally be present for three days. *Community members may want to provide EPA with their input on the locations of the stockpiles to avoid eyesores and temptation for trespassing to access the stockpiles. Community members may want to ask where off-site disposal will occur.*

Technical Comment #7: Section 7.4.2 says hazardous waste classification for dug-up material in the PMP Area would be based on a determination as a characteristic waste through testing for corrosivity, ignitability, reactivity and toxicity using the toxicity characteristic leaching procedure (TCLP). It also includes an explanation that most of the dug-up material will pass the testing and be reused on site. *Community members may want to ask EPA for more information about the frequency of testing for PMP Area dug-up material and whether reuse will be based sometimes on the stated assumptions instead of on actual testing.*

Technical Comment #8: Section 7.4.3 describes groundwater management, and specifically the dewatering of the PMP pond. The RAWP says that substantial amount of water management may be necessary. It describes that the work below the water table is premised on the permit-by-rule provisions within NJAC 7:14A-7.5. This section continues to describe that a localized discharge of dewatering is not expected to adversely affect

groundwater quality downgradient of the PMP pit. Monitoring wells currently exist downgradient of the PMP area that are available for groundwater monitoring. If excavation is required below the water table, dewatering waters will be treated through a temporary treatment system consisting of filters and granular activated carbon prior to discharge to groundwater. *Community members may want to ask for continued updates on the status of the dewatering, what the plan is if 1,4-dioxane is encountered and whether a temporary treatment system is being used.*

Technical Comment #9: Section 7.5 includes information on site grading and capping and refers to drawings that are not in the report. *Community members may want to ask EPA if they can access the grading drawings for each area and comment on them.*

Technical Comment #10: Section 7.5.2 describes the parts of the engineered cap for each area. It consists of:

- A non-woven geotextile placed beneath the cap subsoil as a demarcation layer.
- Eighteen (18) inches of subsoil, which should have a loam texture.
- Six inches of topsoil, per the specifications in The Standards for Soil Erosion and Sediment Control in New Jersey.
- Stabilization of the final cover with vegetation. Where final cover is in an upland area and not part of the restoration for riparian zone or wetlands, revegetation will use a seed mix consistent with the permanent vegetation requirements of The Standards for Soil Erosion and Sediment Control in New Jersey.

Community members may want to ask EPA about plans for future monitoring of the caps. Who will pay for the long-term maintenance? How will EPA share monitoring information? How will EPA enforce the monitoring to ensure the caps' long-term protectiveness?

Technical Comment #11: Section 7.6 provides information about materials management. Coordination of disposal to approved facilities will occur between the contractor and Ford Motor Company. Figure 2 in this report shows proposed truck access routes. *If community members have preferences for when waste will be moved off site, such as avoiding times when school buses or children are outside, they may want to share that information with EPA.*

Technical Comment #12: Section 9 describes site management plans, such as which days people will be working on site. *If community members are interested in site management updates, they could share this interest with EPA, and the community could work with EPA on update preferences and frequency. Community members may also be interested in asking EPA about who they should contact with site management-related questions and concerns and where they can find information on daily site management activities.*

Technical Comment #13: Section 9 mentions an on-site EPA representative, but it does not include any details about oversight by EPA, NJDEP or independent oversight contractors. *Community members may want to ask how often EPA or NJDEP personnel will be at the site, or if there is a plan for oversight and enforcement of federal and state environmental, health and safety regulations.*

Technical Comment #14: Section 9 says that the construction manager (Tom Perkins with de maximis) is responsible for emergency communications involving affected property owners, thefts or damage to site equipment. *Community members may want to ask EPA if community members should call Mr. Perkins first in the case of a site-related emergency. His phone number is 973-670-2871.*

Technical Comment #15: Section 9.2 says that the project coordinator (Craig Coslett with de maximis) will generate a monthly progress report and submit it to EPA. *Community members could ask EPA if it is possible to make these progress reports public.*

Technical Comment #16: Section 9.4 says that “project meetings will be held throughout the implementation of the RA [remedial action] to review the progress of activities, planning of new activities, review of safety and health issues, and any changes to the schedule.” *Community members may want to ask EPA if community representatives will attend these meetings.*

Technical Comment #17: Section 9 includes sanitation practices, social distancing and masking. *Community members may want to ask EPA if workers will take more precautions when interacting with community members or local organizations to reduce potential opportunities for COVID-19 exposure.*

Technical Comment #18: Section 12 describes final restoration and demobilization activities. They include removal of traffic control signs, removal of construction-related trash and debris, repair or replacement of fence/gate sections as needed, and restoration, repaving of the driveway and cul-de-sac on Van Dunk Lane, and sweeping of dust and particulates from Upper Ringwood roadways as necessary. *The community may want to consider if there are any other final activities needed, or if they would like EPA to provide its input on final activities before the completion of all site work.*

Technical Comment #19: Figure 13-1 provides the project schedule. It is illegible unless viewed electronically so that the text can be expanded. Community members have expressed concern about schedule components conflicting with endangered species activities. *Community members with computer access may want to review it and share any questions or concerns with EPA, or ask to be informed of the achievement of particular schedule milestones. Given that schedule updates will happen every two weeks, community members may want to ask EPA to provide updated schedules to their homes. Community members may also want to ask for further clarification about how activities will be adjusted to account for endangered species concerns.*

Technical Comment #20: Appendix B, Section 6 has the external exposure box checked for “Ionizing Radiation.” It does not have the absorption box checked for “Chemically Toxic.” *Community members may want to ask EPA about the source of the ionizing radiation risk and if there really is no absorption risk from any of the chemicals.*

Technical Comment #21: Appendix C, VMP sections 3.1, 3.2 and 3.3 discuss the proximity of residential properties in the vicinity of the three areas and historical subsidence areas. *Community members may want to ask EPA about who to contact with concerns about vibrations, including damages, and communication with residents regarding high-vibration activities. Community members may want to ask EPA if vibration, in addition to historical subsidence, poses a risk to adjacent residential properties and, if so, how parties will manage or mitigate that risk. Community members may want to ask EPA if vibration protection can be put in place if needed to protect residents and if settlement is mainly a roadway concern or is also a concern for structures.*

Technical Comment #22: Appendix C, VMP Section 4 discusses pre-construction inspections. These inspections will take place on areas surrounding work zones. These areas may include residential structures and other aboveground infrastructure such as garages and sheds. *Community members may want to ask EPA how parties will coordinate the inspections with homeowners.*

Technical Comment #23: Appendix C, VMP Section 11 discusses post-construction completion. It says that there will be inspections for all locations that had pre-construction inspections. *Community members may want to ask EPA how parties will coordinate the inspections with homeowners.*

Technical Comment #24: Appendix D includes the CAMP. There will be three perimeter air monitoring stations in each active work area. Stations will be set up around the work area, with one upwind and two near the perimeter at downward locations. Actual monitoring station arrangement will be reviewed and modified

daily, based on the location of work and wind direction. *Community members may want to review the sample air monitoring station location maps (shown in Figure 4 at the end of this fact sheet) to make sure they are comfortable with this arrangement. They may also want to request communications about the actual placement locations of the stations during cleanup activities, including the distance the air monitors are located from the actual work. If community members know of sensitive populations or locations that should be monitored more closely, this information could help inform monitor placement.*

Technical Comment #25: Section 8.2 identifies benzene as a chemical hazard to be monitored. Section 9 indicates that benzene will be monitored in work zone air using real-time equipment. Appendix D, Section 3.1 seems to indicate that only total volatile organic compounds (TVOCs) will be monitored as a whole, not benzene or other specific volatile organic compounds (VOCs). *Community members may want to ask EPA to explain the air monitoring plan and whether benzene will be included in air monitoring.*

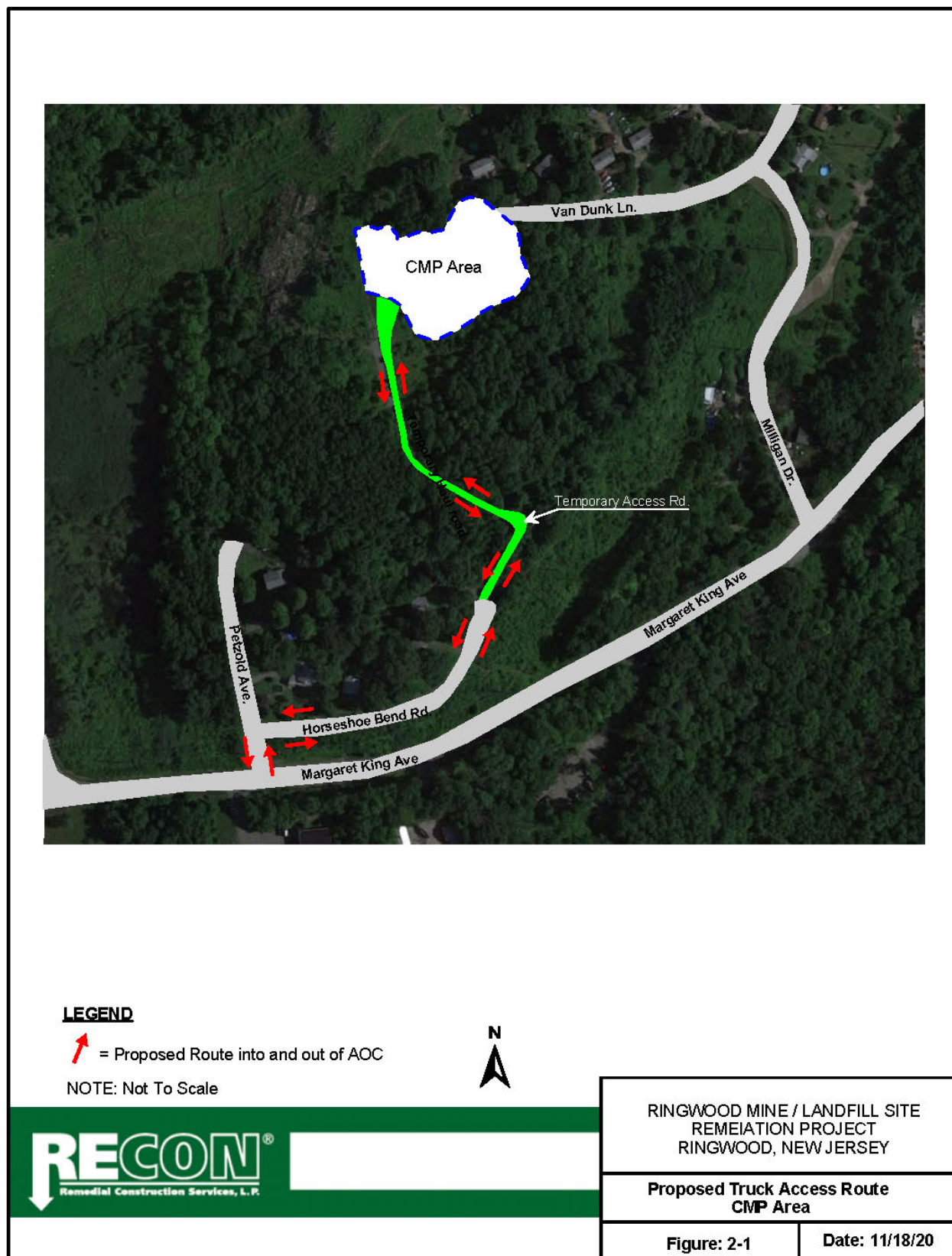
Technical Comment #26: Appendix D, Table 2 provides TVOC action levels for the perimeter air monitoring location. Based on the analysis, the TVOC action level is based on ethylbenzene. It is unclear how this calculation was made, given that the action level of 4 parts per million is greater than the site-specific screening level for ethylbenzene of 38 parts per billion or 0.038 parts per million. *Community members may want to ask for an explanation of the TVOC action level and understand how it is low enough to protect their air.*

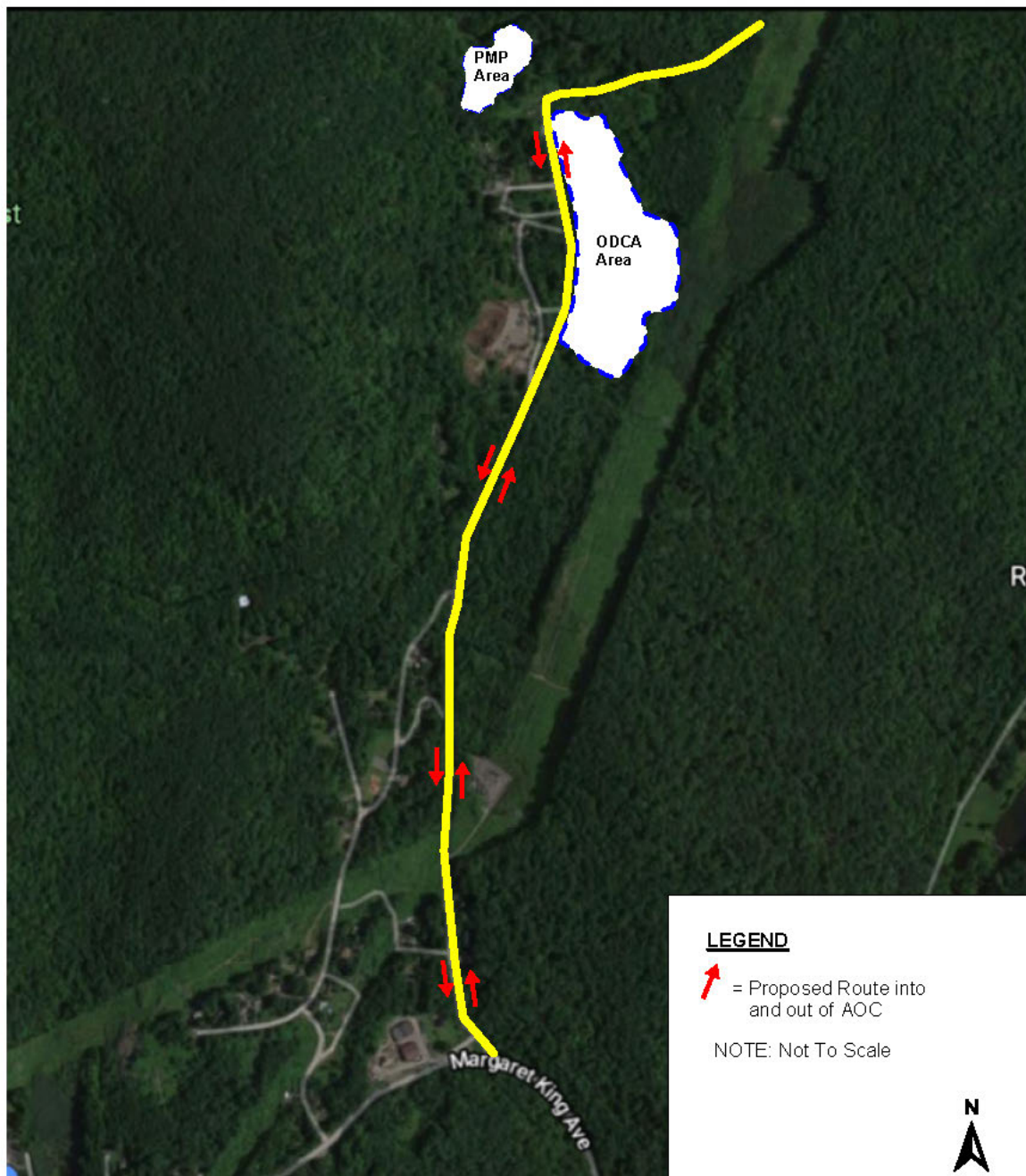
Technical Comment #27: Appendix H, the Transportation & Disposal Plan, indicates that RECON's project team will communicate with the Borough about traffic control measures and school bus schedules in Upper Ringwood. *Community members may want to communicate any transportation-related concerns or suggestions to Borough leadership and EPA.*

Technical Comment #28: Appendix H, Transportation & Disposal Plan, Section 3 describes area traffic routes. Site-related vehicular traffic will use Peters Mine Road to access work areas for the PMP Area and the OCDA. Traffic will access the CMP Area from Horseshoe Bend Road. *Community members may want to ask EPA who residents should contact with traffic-related concerns or feedback during cleanup activities.*

Technical Comment #29: Appendix H, Transportation & Disposal Plan, Section 4 says that any changes to the Transportation & Disposal Plan or to traffic routes will be subject to approval by the Borough. *Community members could ask EPA and Borough leadership about how parties will share these changes with community members.*

Figure 2: Proposed Truck Access Routes to Each Area





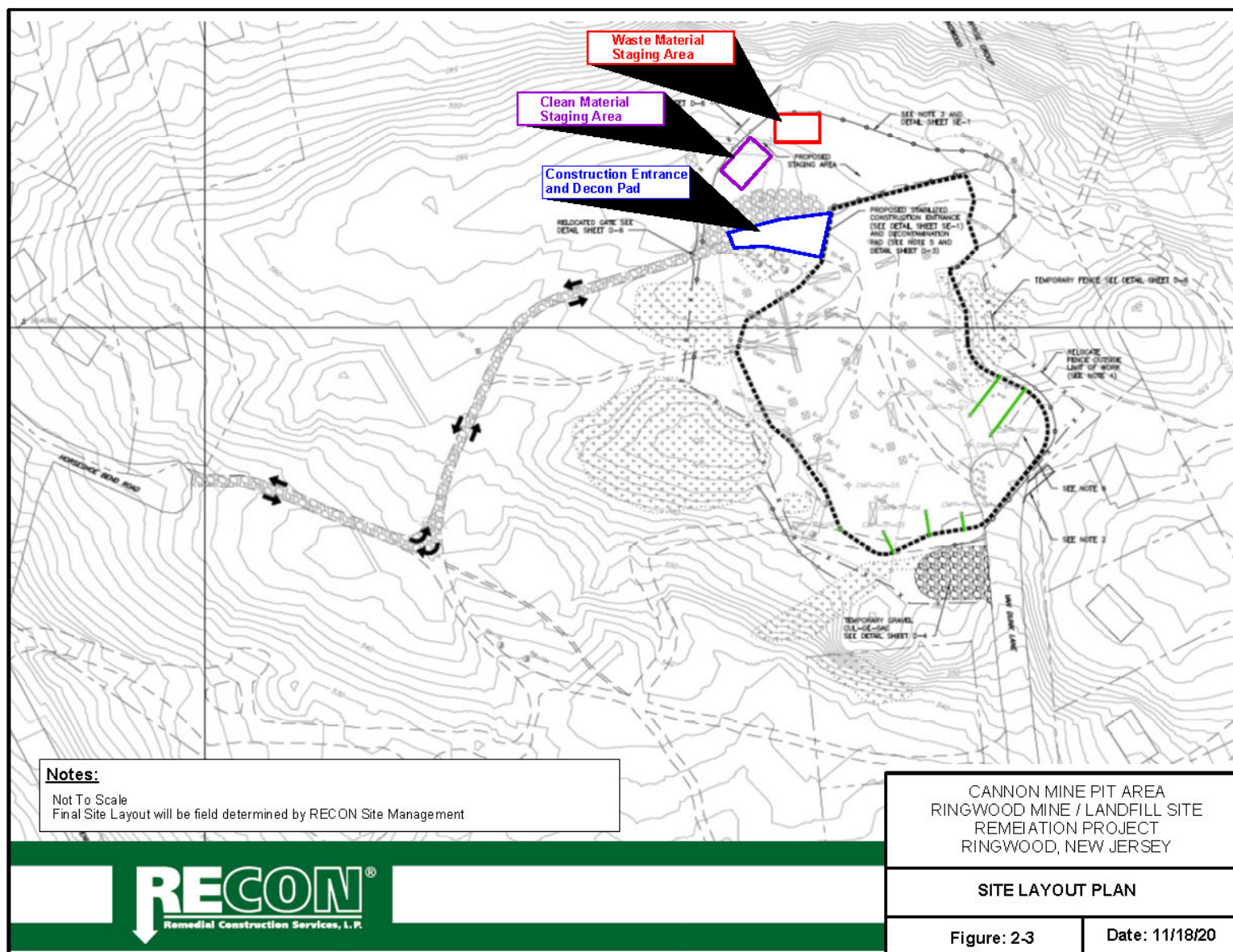
RINGWOOD MINE / LANDFILL SITE
REMEIATION PROJECT
RINGWOOD, NEW JERSEY

**Proposed Truck Access Route
PMP and ODC Areas**

Figure: 2-2

Date: 11/18/20

Figure 3: Site Layout Plans



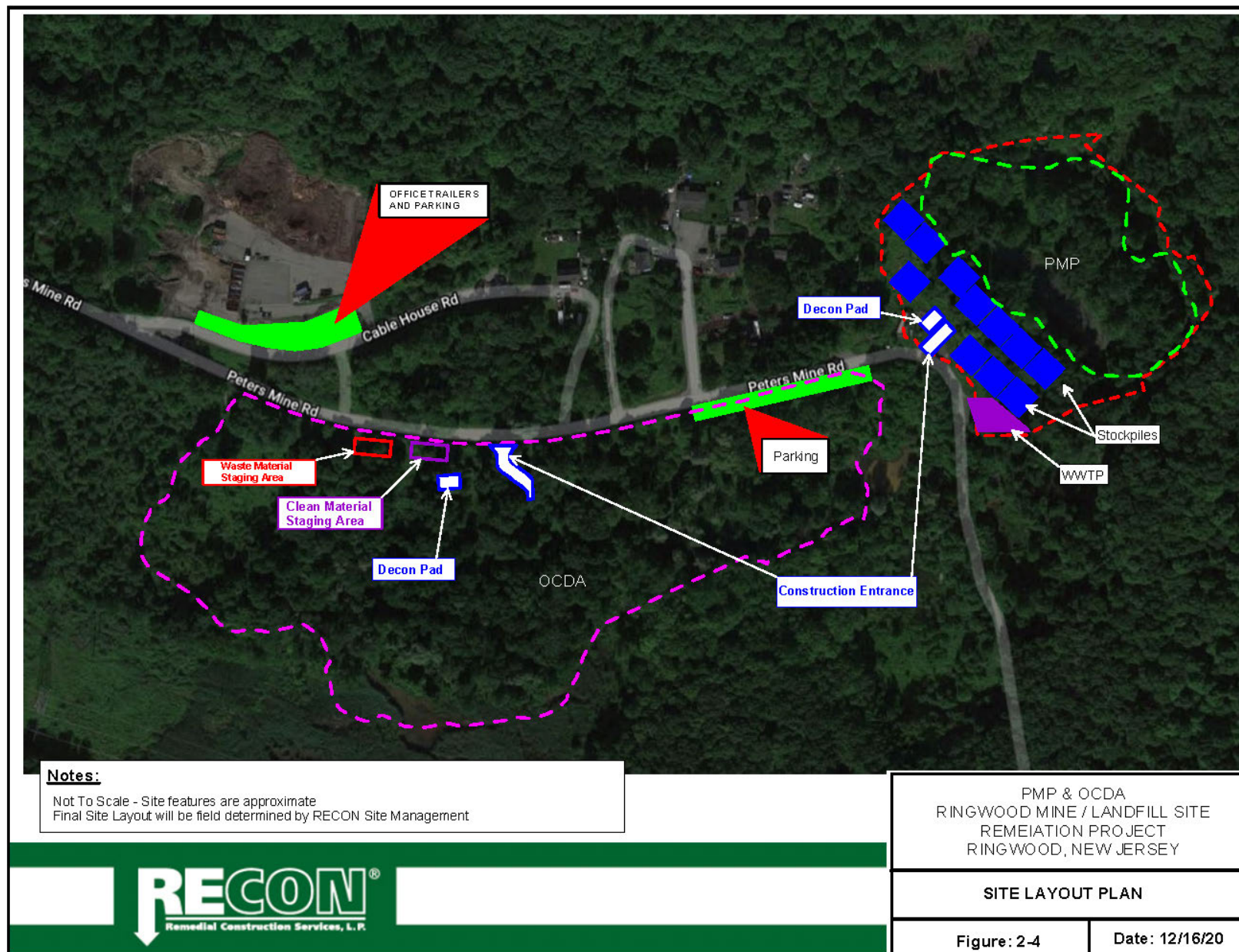
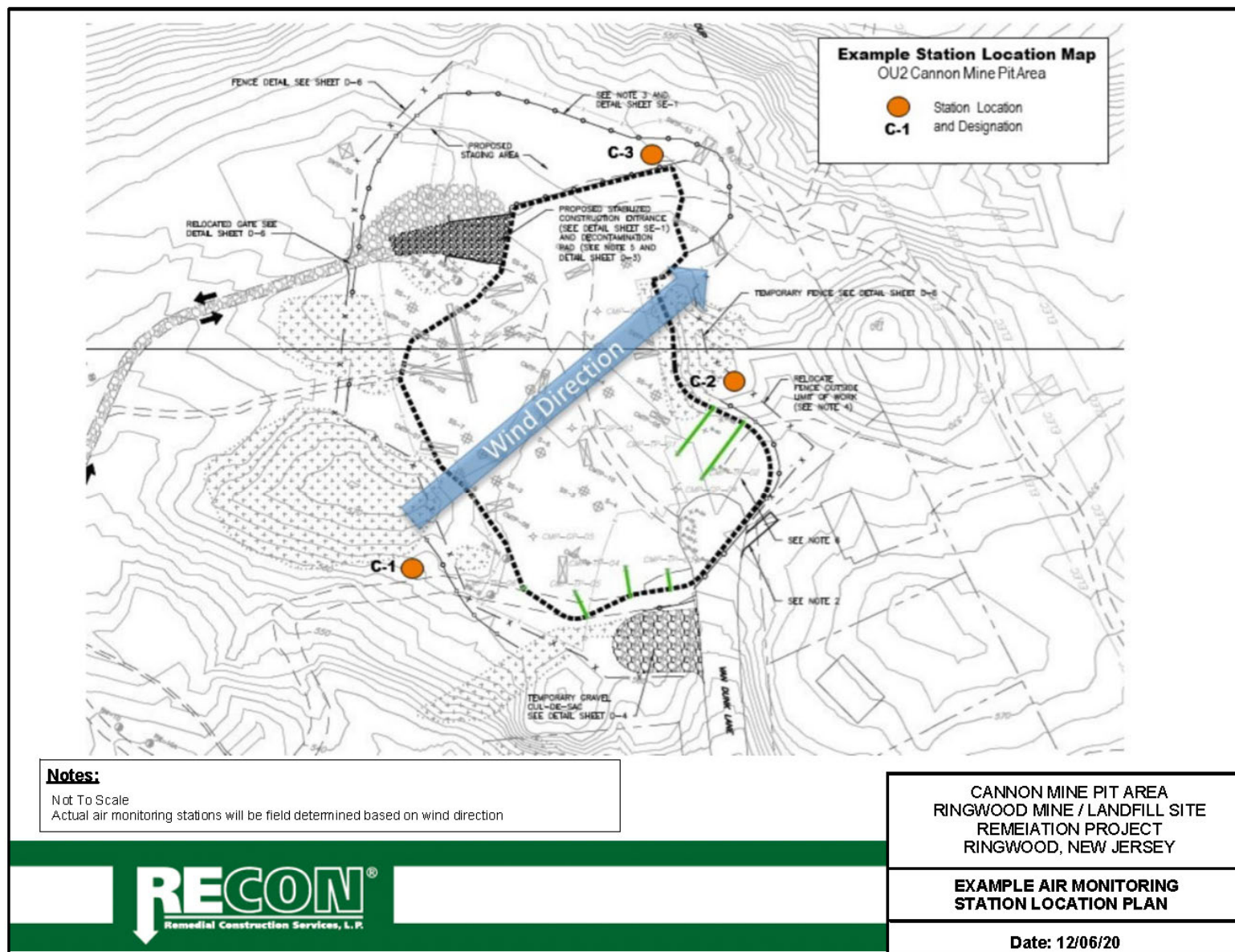
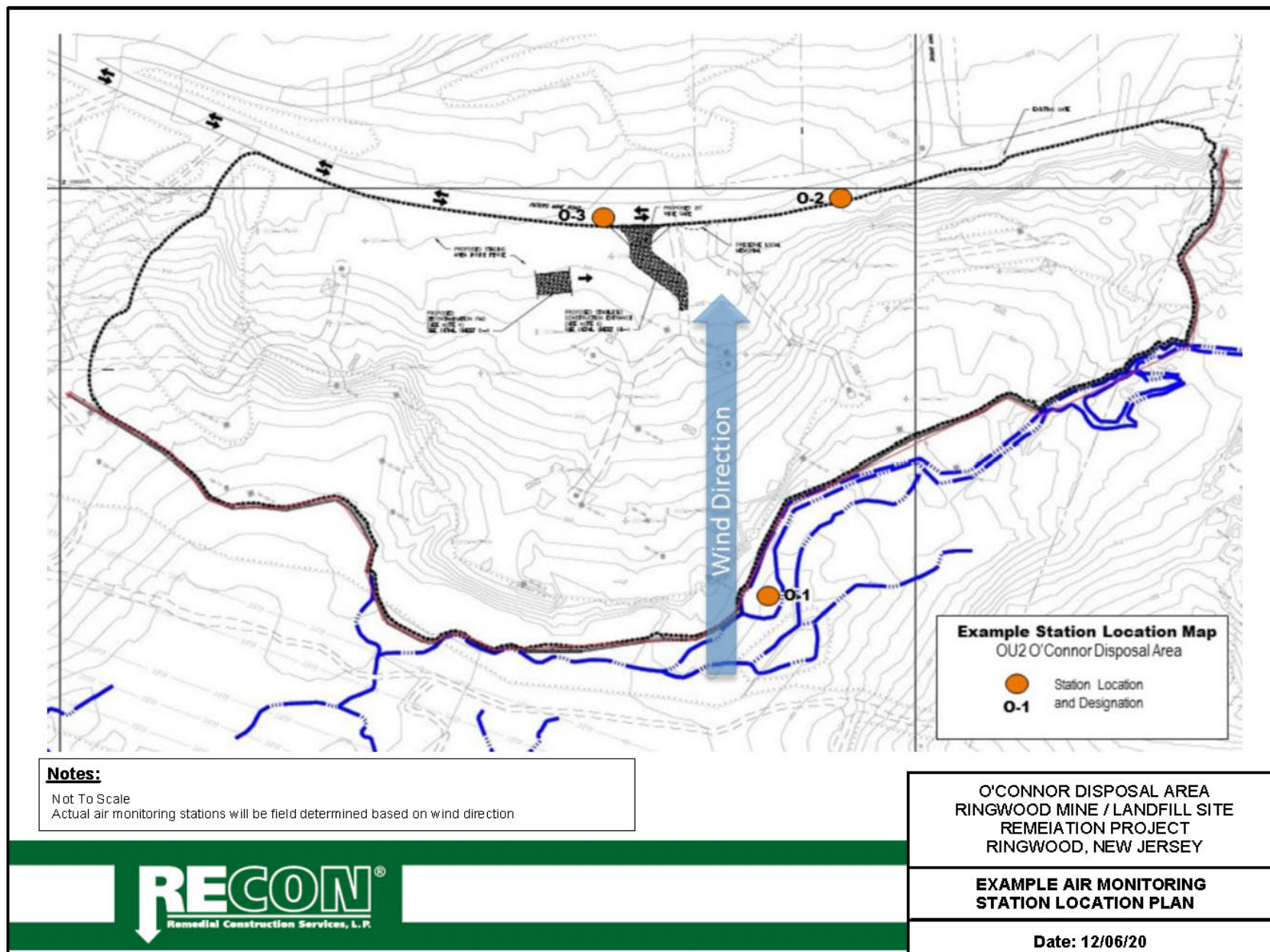
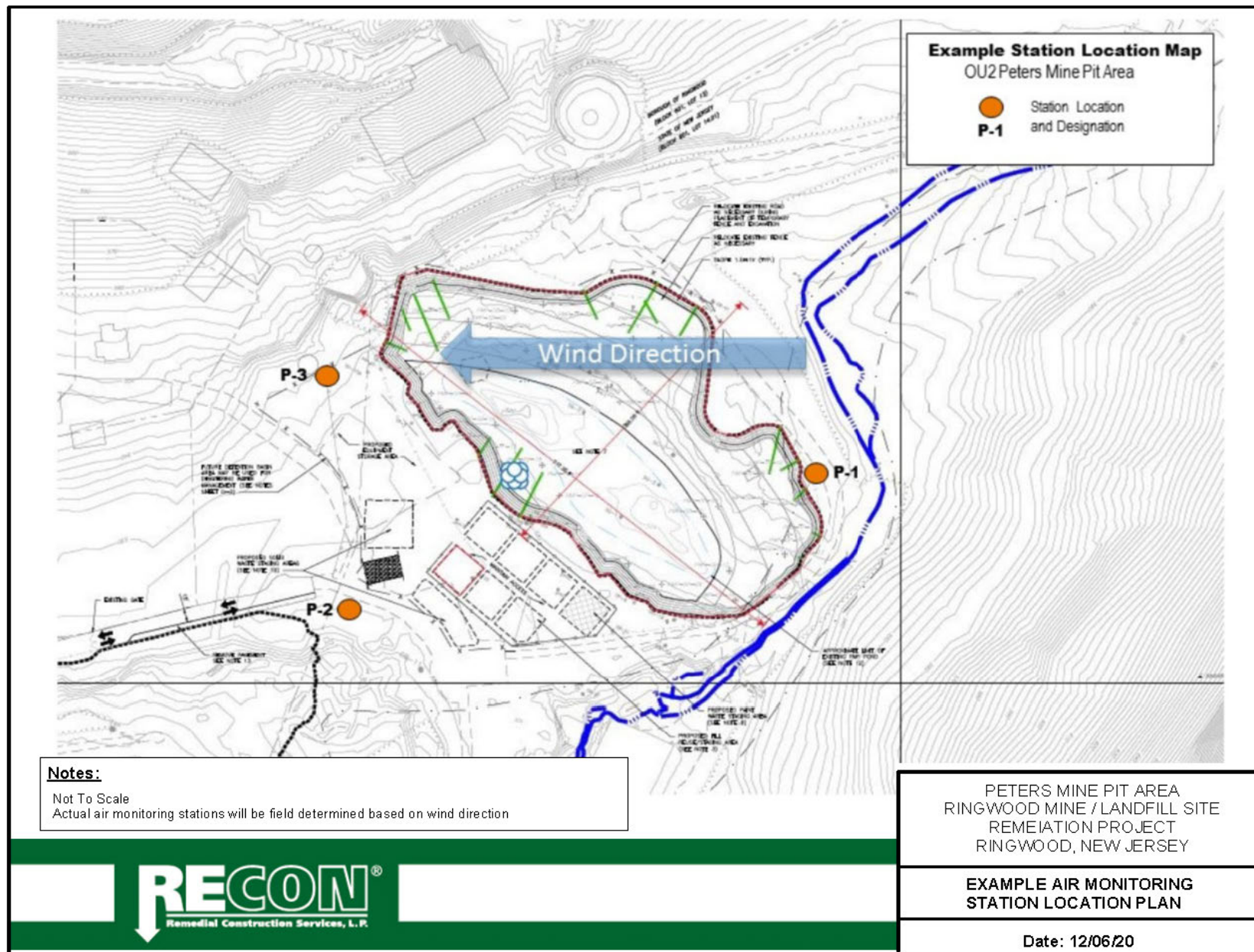


Figure 4: Sample Air Monitoring Locations (RAWP Attachment B)









RE: Ringwood Superfund Site OU-2 RAWP
Ringwood Environmental Commission Comments

Thursday, February 4, 2021

Mr. Gowers:

Thank you for the opportunity to comment on the Ringwood Superfund Site OU-2 RAWP.

The Ringwood Environmental Commission reviewed the plan as it pertains to OU-2. We have heard that this work will also include the remediation for OU-3, but that is not covered in this document. Therefore, our comments are only in reference to the plans for OU-2.

Please note that multiple references are made to design drawings, especially Design Drawing PMP-3 and Design Drawing D-4. They do not appear to be in the document.

Below is our list of questions and concerns about the Ringwood Mines Superfund Site OU-2 RAWP.

1. Public Safety and Security Issues

- a. Large construction equipment moving to and from the site and securing the site after work hours to avoid safety risks to the public and nearby residents. Need to consider temporary fencing and signage to keep hikers, hunters and others out of the hazard zones.
- b. Consider monitoring the site during off hours and weekends with a security firm conducting periodic patrols.
- c. Additional fencing should be added around all sites. Currently, fencing is entirely missing in some areas, especially around OU-2. In other area, including the opening to Peter's Mine, access gates are open and some portions of fencing have been cut open. Separately, we remain concerned that deep mine openings and associated mine buildings are completely open. In some cases, a person could easily stumble down over 100 feet if they get lost and do not realize they are in close proximity to the old mine workings.

2. Construction Truck Traffic

- a. There is concern about large dump trucks creating a public safety hazard. Need to have designated safe truck routes and speed limits to avoid steep hills.
- b. Special consideration should be given to public school bus routes during school hours as there are no sidewalks in the area so children

will have to share the roadway with construction vehicles. While school bus routes are in the plans, we would like to see large signage indicating the hours of school bus routes.

- c. Some parts of the plan call for a 5mph speed limit while others call for a 15mph speed limit. It is not clear if these are contradictory or indicated for different parts of the work area.

3. Peter's Mine Pit

- a. Concern about the dewatering of the contaminated pond water above the PMP mine and to ensure it is properly treated before discharge to ground. How do we ensure the contaminated water is tested and treated properly?
- b. The area has been identified as a source of 1,4 -Dioxane (likely a human carcinogen) in the PMP pond and groundwater. The RAWP does not address 1,4 - Dioxane treatment in the PMP area. Is the PMP pond and groundwater going to be tested for 1, 4 - dioxane? If discovered again, how is it going to be dealt with and treated. We know that normal geo filters and activated carbon do not work. We recommend developing a plan for detecting and treating 1,4 - dioxane in the PMP.
- c. On page 36 of the pdf document, it states "There is no documentation indicating that listed hazardous wastes were disposed of in the PMP Area." This seems absurd. O'Connor Trucking has specifically said they dumped sludge into Peter's mine and the testing done onsite shows the highest concentrations of pollutants in those results.
- d. How are the VOC's from the PMP's saturated soil after dewatering the pond going to be treated and residents protected? Will air monitoring stations be installed directly around the PMP remediation area to alert residents, workers and visitors of real-time chemical exposure hazards? At the same time, perimeters air monitors are stationed around the entire site.

4. Managing Outside Contractors and Communication with Same

- a. There is concern about safely managing a large number of outside contractors to avoid public safety hazards and serious onsite accidents. Recommend mandatory sign-in for every site visit and safety orientation training for all subcontractors and visitors. RECON should designate a person with this responsibility.
- b. Please recommend establishing a RECON Site Communication Plan to ensure timely updates and testing results are communicated to residents on a periodic basis. And posting results on the EPA or Ringwood website. This should include a quick process to relay any safety violations to the residents immediately; especially air monitoring alerts.
- c. The plans clearly lay out that any worker onsite can give a stop work order if they observe a violation. What is the process if a Borough employee or local resident observes a safety issue?

5. Compliance with EPA and OSHA regulations

- a. Concern that shortcuts and lack of compliance with all Federal and State environmental, Health and safety regulations are being followed in a short timeframe with strict financial constraints. Recommend

periodic safety, health, and environmental inspections by independent parties or contractors. We do not expect the general contractor to audit themselves.

- b. We recommend a complete list of Material Safety Data Sheets be made available at the site for all potential chemical and hazardous substances that have been identified at the site, only 3 MSDS's (lead, arsenic, benzene) are included in the RAWP. Missing a number of MSDSs including 1,4 -dioxane, chloroethane, cadmium, trichloroethane, PCB's, etc.
 - c. Water detention basins are designed on the 25-year stormwater information. We would like to know if this is the old designations or if it has been updated recently to include the increased major events and global warming. Ringwood has experienced a number of events in the past 10 years that exceed 25-year storms, including 100-year storms. We recommend exceeding the 25-year stormwater guidance and designing larger stormwater basins. This should be of critical importance due to the proximity to the Wanaque reservoir.
 - d. Where is the weigh station going to be located? This is mentioned in the document, but is not reflected on any map.
6. Environment and Endangered Species
- a. The Endangered Species inspections should have already been conducted in October. Where are those results? Also, is it appropriate to only conduct one round of inspections in October when the spring season is the most robust for many species?
 - b. Habitat Best Management Practices Manual is referenced in pages 1178-1179, but is not included. How do we get a copy of this document?
 - c. Clearing and Grubbing are indicated to happen between March 1st and April 15th. This contradicts that endangered species concerns that no clearing should take place between March 15th and June 15th. We would like to see the timeline match the endangered species constraints. Especially in OCDA where clearing is not slated to begin until March 15th.
 - d. On page 1260 (SECTION 32 92 19 – Seeding and Planting), phosphorous is indicated as part of the fertilizer mix for turf grass. The NJDEP does not allow phosphorous in fertilizers unless a soil test indicates a need for it. They also require 20% of the mix to be slow-release nitrogen. This should be updated in the document or a reference to the soil test should be given.
7. Community Involvement
- a. Please consider community and nearby resident involvement by establishing a trusting relationship based on communicating the facts, transparency and involvement, e.g. site tours, website updates, special meetings, if necessary.
 - b. **Involve the Ringwood Environmental Commission in this very important and complex project to ensure extra resources are available to help bolster lean Borough resources. Some expert**

**and excellent professional resources are available on the
Ringwood Environmental Commission team.**

Thank you again for taking the time to review the concerns of the Ringwood Environmental Commission.

Regards,
Joe Kulak, CSP (retired)
Commissioner, Ringwood Environmental Commission

Thomas Conway
Chair, Ringwood Environmental Commission

RECON OU2 – Comments on RECON Work Plan

2/12/21

By: Jim Guinan, Ringwood Resident

SUMMARY

Work Plan

There is no coordination of OU2 work at PMP (soil remediation) with OU3 work (groundwater remediation) at PMP. This lack of coordination will result in unnecessary costs and/or delay claims.

Health and Safety Plan – Appendix B

1. This refers to OSHA Standards for Worker Protection. Only PM₁₀ and selected chemicals are monitored.
2. The Cannon Mine area has had a death from the ground collapsing beneath a person walking. There has also been sinkhole caused a house to be condemned.

How is worker safety being protected from unstable earth?

Community Air Monitoring Plan – Appendix D

1. Air Monitoring is at the perimeter of the three AOC's in accordance with OSHA standards.

There is no acknowledgement of the residences which are within the Superfund Site and near the worksites. National Ambient Air Quality standards should be applied to these residential areas. NAAQS require 24 hour/7 day per week monitoring for both PM₁₀ and PM_{2.5} dust particles, and have lower allowable limits.

DETAILED COMMENTS

WORK PLAN

Sheet 1 of 1279

There is no coordination between OU2 (soil remediation) and OU3 (groundwater remediation) at PMP.

- OU2 – Final grading and planting around PMP will be disturbed by OU3 contractor and his equipment
- OU3 – This contract cannot be competitively bid, since the OU2 contractor is already mobilized on the site.

RECON Schedule:

Sheet 66 & 67 of 1279

The RECON schedule does not show OU3 work at PMP (schedule tasks 44 to 56)

This lack of coordination will result in unnecessary extra work (costs) and/or delay claims.

Most likely the OU3 work will be given to RECON as a change order without competitive bidding.

Appendix B – Health and Safety Plan

Sheet 94 of 1279

1. This refers to OSHA Standards for Worker Protection. Only PM₁₀ and selected chemicals are monitored. Other hazardous chemicals at this site are not monitored.
2. Sink Holes: The Cannon Mine area has had a death in 1963 from the ground collapsing beneath a person walking. There has also been sinkhole which caused a house to be condemned in 2005.

How is worker safety being protected from the unstable earth and cave-ins?

3. Page 22 – references to page 25 & 25 are not correct
4. Page 23 & 24 – Directions are incorrect. Origin should be Project Site, Not Borough Hall.
5. Page 23 – Good Samaritan Hospital is in Suffern NY, not Montebello.
6. Page 24 – Verify if Ringwood Ambulance Corps will take a person to a medical facility in Clifton. Closer facilities include: St Joseph's Hospital in Paterson (Level II Trauma Center), and Chilton Hospital.
7. Page 25 – The Project Site is not located on Stetson Road.

8. Page 34

Item #16 - Construction of the new Recycling Center should be before
“Decommissioning” the existing one.

Appendix D – Community Air Monitoring Plan

Sheet 312 of 1279

1. The title is deceiving – it is designed for worker protection, but not adequate for nearby “Community” residents.

Worker protection is defined by OSHA (the Occupational Safety and Health Administration) which is concerned with worker safety. Workers are assumed to be healthy individuals who will be exposed to hazardous substances for 40 hours per week, then go home to a “clean” environment.

The public is protected by NAAQS (National Ambient Air Quality Standards, which are part of the Clean Air Act), and are applicable to the nearby residents, who are exposed 24 hours per day and 7 days per week to the pollutants. NAAQS primary standards provide public health protection, including protecting the **health of "sensitive" populations** such as asthmatics, children, and the elderly. NAAQS standards are much stricter than OSHA standards, due to the longer exposure (168 hours per week) and more sensitive population.

For dust particles, OSHA is based on **PM₁₀**, which are particles of 10 micron size.

NAAQS also requires measurement of **PM_{2.5}**, which are smaller particles of 2.5 micron size. Particles in the **PM_{2.5}** size range are able to travel deeply into the respiratory tract, reaching the lungs. Exposure to fine particles can cause short-term health **effects** such as eye, nose, throat and lung irritation, coughing, sneezing, runny nose and shortness of breath. NAAQS also limits exposure to certain hazardous chemicals.

2. RECON Work Plan:
 - a. Sheet 318: monitoring will be conducted continuously during all field work activities. The Work Plan states this is 10 hours per day, 5 days per week. NAAQS are based on 24 hour per day exposure.
 - b. Action levels are based on OSHA, they should be NAAQS and also include recommended chemical exposure levels from EPA and NJ DEP and other authorities for hazardous chemicals found at this site.
 - c. RECON’s Work Plan does not include arsenic, 1,4 dioxane, and other COC’s known to be at this site.

Windstorms can occur any time, day or night, which can blow loose contaminated soil onto nearby residences.

3. Recommendations:

- a. Monitor exposure to hazardous substances for nearby residential properties per NAAQS, and recommended hazardous substance exposure levels from EPA, NJ DEP and other authorities.
- b. Perform monitoring on a 24 hour/7 days per week basis. This may be done using a remote reporting of status and alarms to a 24 hour monitoring service.
- c. Have dust mitigation equipment and staff available to be used, if necessary, on a 24 hour/7 days per week basis.
- d. Show locations of nearby residences on the Monitoring Station Location Plans, sheets 232,233. And 234. Show locations of NAAQS monitoring stations on these drawings.
- e. The Work Plan proposes relocating the “Community” monitoring stations depending on wind direction. They cannot be relocated if they are to monitor for 24/7 occurrences at each nearby residence.
- f. Submit for approval the revised monitoring station plans, equipment, on-site monitoring staffing, and remote monitoring agency (if used).

Appendix E – Quality Assurance Plan

Sheet 335 of 1279

12.0 Sampling Design and Rationale

Sheet 358 of 1279

- a. Item 1 states incorrectly: “The PMP area is the only area of the Site where excavated soils/waste will require testing to determine if the material can be reused or transported off Site for disposal.”

OU2 ROD summary, dated 6/30/2014 states:

PMP – Hazardous material to be disposed off-site

CMP – Off-site disposal of any drums of waste

OCDA – Disposal and/or recycling of material at off-site recycling facility.

Non-hazardous material may be used as fill for PMP.

This section should be corrected.